

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF NORTH CAROLINA
ASHEVILLE DIVISION

FILED
CHARLOTTE, NC

MAR 20 2019

US DISTRICT COURT
WESTERN DISTRICT OF NC

UNITED STATES OF AMERICA

v.

KEITH ERIC SAUNDERS

DOCKET NO. 1:19CR24-MR-WCM

BILL OF INDICTMENT

Violations:

18 U.S.C. § 2251(a)

18 U.S.C. § 2252A(a)(5)(B)

THE GRAND JURY CHARGES:

COUNT ONE

On or about February 12, 2018, in Transylvania County, within the Western District of North Carolina and elsewhere,

KEITH ERIC SAUNDERS

did employ, use, persuade, induce, entice, and coerce a minor to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate and foreign commerce, and **KEITH ERIC SAUNDERS** knew such visual depiction would be transported and transmitted using any means and facility of interstate and foreign commerce, and did attempt to do so.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

On or about February 12, 2018, in Transylvania County, within the Western District of North Carolina and elsewhere,

KEITH ERIC SAUNDERS

knowingly possessed and accessed with intent to view any material that contained an image of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), and that has been mailed, and shipped and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer, and that was produced using materials that have been mailed, and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

NOTICE OF FORFEITURE AND FINDING OF PROBABLE CAUSE

Notice is hereby given of 18 U.S.C. § 2253 and 21 U.S.C. § 853. The following property is subject to forfeiture in accordance with 18 U.S.C. § 2253 and 21 U.S.C. § 853:

- a. Any visual depiction or book, magazine, periodical, film, videotape, or other matter which contains any such depiction, which was produced, transported, mailed, shipped, or received during the violations set forth in this bill of indictment;
- b. Any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from proceeds of the violations;
- c. Any property, real or personal, used or intended to be used to commit or promote the violations; and
- d. If, as set forth in 21 U.S.C. § 853(p), any property described in (a), (b), or (c) cannot be located upon the exercise of due diligence, has been transferred or sold to, or deposited with, a third party, has been placed beyond the jurisdiction of the court, has been substantially diminished in value, or has been commingled with other property which cannot be divided without difficulty, all other property of the defendant/s to the extent of the value of the property described in (a), (b) and (c).

The Grand Jury finds probable cause that the following property was seized during the course of the investigation of the offenses herein is subject to forfeiture on one or more of the grounds stated above:

1. A Samsung Galaxy S7 Cell Phone.

R. ANDREW MURRAY
UNITED STATES ATTORNEY

A TRUE BILL:

GRAND JURY FOREPERSON



DAVID A. THORNELOE
ASSISTANT UNITED STATES ATTORNEY